



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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HOWARD HENRY,	:
	:
Plaintiff,	:
	:
-against-	:
	:
WYETH PHARMACEUTICALS, INC., WALTER	:
WARDROP, ANDREW SCHASCHL, and	:
MICHAEL McDERMOTT,	:
	:
Defendants.	:
-----X	

05-cv-8106 (RCC)(DFE)

**AFFIDAVIT OF  
DAISY EARLY**

STATE OF NEW YORK     )  
                                  ) ss.:  
COUNTY OF ROCKLAND )

**Daisy Early**, being duly sworn, deposes and says as follows:

1. I am a former employee of Wyeth Pharmaceuticals, Inc. ("Wyeth") and was forced to end my 29-year career there after I was the target of a number of discriminatory comments and, after I complained, a number of retaliatory actions ensued. Plaintiff Howard Henry was one of my coworkers, and some of the comments and retaliatory actions I witnessed are relevant to his claims, which prompted me to make this affidavit. Accordingly, I am fully familiar with the facts and circumstances set forth herein.
2. I am an African American who is 56 years old, and my position at Wyeth was as a Pharmaceutical Operator in Centrum® production. As such, two of my managers were Robert Bracco and Defendant Walter Wardrop.

***Mr. Bracco's Discriminatory Comments***

3. In or about the spring of 2001 my request for a shift change was denied for what I believe

to be discriminatory reasons. I pointed out to Mr. Bracco that other white employees were granted shift change requests, and I provided one example of a white employee who was granted such a request during the summer for an entire month so that she could sunbathe during the day. Mr. Bracco yelled at me and said, "So sue me. All my supervisors are black so you can't prove discrimination."

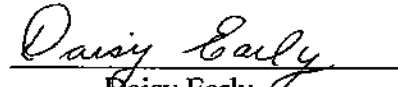
4. Immediately after this incident, I began experiencing symptoms of stress and anxiety and I took a medical leave from work. A few weeks after I returned to work, Mr. Bracco was ill, and he stated to another employee, "Daisy tried to put voodoo on me but it didn't work." Upon Mr. Bracco's return to work, he visited Crystal Bullock's inspection area and again stated, "Daisy tried to put voodoo on me." Mr. Bracco then began to show Ms. Bullock certain parts of his body where I supposedly inflicted voodoo on him.

***Defendant Wardrop's Discriminatory Comment***

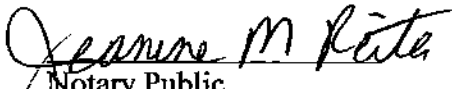
5. One morning when I was coming into the 100 Complex building at the Wyeth Pearl River plant, Defendant Wardrop stopped me in the hallway and said, "Daisy, what are you doing at home? Sticking pins in a doll? What have I ever done to you?" I was utterly shocked, and reported this incident to Michael Todd Davenport, Centrum® Production Coordinator, whose only response was, "If you knew all of the things that had gone wrong that night, you would understand the statement," implying that such a statement was acceptable to make based upon the events of the night before. I then replied, "The only way I would be able to understand that statement is if he stopped everyone who was coming into work that morning and told them the same thing."
6. After this incident, I was subjected to various adverse employment actions which I feel

were retaliatory in nature, and I will be bringing my own discrimination and retaliation claims against Wyeth in the courts of New York State. However, I felt it was necessary to show the Court that Defendant Wardrop not only aided and abetted the denial of promotional opportunities for Wyeth's black employees (like in Plaintiff's case), but he also makes racial comments to and about his black employees. He harbors a discriminatory animus which I feel contributed to Plaintiff's bad performance reviews because I have been the target of his racial comments myself.

7. **WHEREFORE**, I respectfully submit that the Court should deny Defendants' motion in its entirety.

  
Daisy Early

Sworn to before me this  
20 day of November, 2006

  
Notary Public

JEANINE M. REITER  
Notary Public State Of New York  
Qualified In Rockland County  
Lic. #01RE6054404  
Commission Expires February 5, 2007